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Cambrex North Brunswick, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

H&H PHARMACEUTICALS, LLC, a
Nevada limited liability company,

Plaintiff,

v.

CAMBREX CHARLES CITY, INC.
AND/OR CAMBREX NORTH
BRUNSWICK, INC.; DOES I through X;
and ROE CORPORATIONS XI through
XX, inclusive,

Defendants.

Case No.: 2:16-cv-02946-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER TO SUSPEND DEADLINE TO
FILE JOINT PRETRIAL ORDER**

(FIRST REQUEST)

Pursuant to Local Rules 7-1 and IA 6-1, Defendants Cambrex Charles City, Inc., and Cambrex North Brunswick, Inc., (collectively, "Cambrex"), by and through its counsel of record, Peterson Baker, PLLC, and Plaintiff H&H Pharmaceuticals, LLC ("H&H"), by and through its counsel of record, Maier Gutierrez & Associates, hereby stipulate and agree, subject to this Court's approval, as follows:

1. Pursuant to the Discovery Plan and Scheduling Order [ECF No. 31], in the event dispositive motions were filed, the date for the Parties to file the Joint Pretrial Order was suspended until thirty (30) days after the decision on the dispositive motions or until further order of this Court.
2. Pursuant to the Order to Extend Discovery Deadlines [ECF No. 43], the deadline for the Parties to file the Joint Pretrial Order is July 29, 2019, with no reference to dispositive motions.

1 3. Cambrex filed its Motion for Summary Judgment [ECF No. 51] on June 27, 2019,
2 and H&H's response to the Motion for Summary Judgment is due on or before July 18, 2019.

3 4. The Parties had previously agreed, and the Court had approved, to suspend the
4 deadline for filing a joint pretrial order, but the subsequent Order to Extend Discovery Deadlines
5 [ECF No. 43] is ambiguous in that it does not refer to suspension of this requirement.

6 5. The Parties agree that resolution of the issues that are raised in the Motion for
7 Summary Judgment [ECF No. 51] will assist the Parties in preparing a Joint Pretrial Order, should
8 one still be required following resolution of the Motion for Summary Judgment.

9 6. The Parties desire to preserve time, energy and resources while the Motion for
10 Summary Judgment [ECF No. 51] is pending before this Court and desire to suspend the deadline
11 for the Parties to file the Joint Pretrial Order. The Parties assert that judicial economy would be
12 served by suspending the deadline for the Parties to file the Joint Pretrial Order until after a decision
13 on the Motion for Summary Judgment [ECF No. 51] is filed or until further order of the court.

14 7. This is the first request for a suspension of the deadline to file a Joint Pretrial Order
15 pending resolution of the Motion for Summary Judgment [ECF No. 51].

16 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
17 Parties, subject to the Court's approval, that the deadline to file the Joint Pretrial Order is suspended

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1 until thirty (30) days after a decision on the Motion for Summary Judgment [ECF No. 51] is filed
2 or until further order of the court.

3 Dated this 8th day of July, 2019.

4 PETERSON BAKER, PLLC

MAIER GUTIERREZ & ASSOCIATES

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LLC*

16 IT IS SO ORDERED.

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18 UNITED STATES MAGISTRATE JUDGE

19 Dated: July 10, 2019